

Minnesota Pollution Control Agency



April 5, 2002

2002 6 0 RPA

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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Mr. Charles Meyer, City Manager
City of St. Louis Park
5065 Minnetonka Boulevard
St. Louis Park, Minnesota 55416

Mr. Thomas Reilly, Jr., President
Reilly Industries
300 N. Meridian Street, Suite 1500
Indianapolis, Indiana 46204-1763

RE: United States of America, et al. Vs. Reilly Tar & Chemical Corporation, et al.
File No. Civ. 4-89-468, Consent Decree - Remedial Action Plan (CD-RAP)
2002 Sampling Plan - Reilly Tar & Chemical Corp., St. Louis Park, Minnesota, by ENSR
October 2001

Dear Mr. Meyer and Mr. Reilly:

Staff from the Minnesota Pollution Control Agency (MPCA) and the United States Environmental Protection Agency (U.S. EPA) (Agencies) have reviewed the 2002 sampling plan for Reilly Tar & Chemical Corp., St. Louis Park, Minnesota, submitted in October 2001 by ENSR.

The Agencies concur with the monitoring well selection and sampling frequency proposed in the report. The major concern of the Agencies, is the change of the analytical method to the EPA Method 8270C for the ground water samples collected in the drift and Platteville aquifers. The EPA Method 8270C would result in a significant number of Polyaromatic Hydrocarbons (PAHs) listed in the Consent Decree to not be analyzed. Due to generally higher PAH levels in the Drift and Platteville aquifers, a modified analytical method which can analyze all the PAHs described in the Consent Decree at a part per billion (ppb) detection level would be acceptable to the Agencies. Please provide for the Agencies' review, a copy of a modified analytical method that meets the above criteria.

Other general concerns of the Agencies about the Quality Assurance Project Plan (QAPP) should be noted:

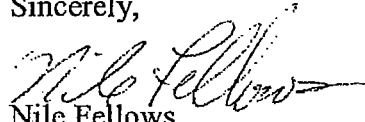
- 1) That recoveries of less than 30 percent for spikes, surrogates, or laboratory control samples are generally not accepted;
- 2) A copy of the Data Validation SOP should be included as an attachment to the QAPP; and
- 3) The person(s) who perform the validation, including reviewing raw data and the calibrations should be listed.

Mr. Charles Meyer, City Manager
Mr. Thomas Reilly, Jr., President

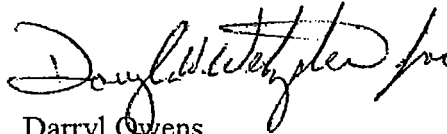
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This letter constitutes an approval of the sampling plan with the exceptions indicated above. If you have any questions, please contact Nile Fellows at (651) 296-7299 or Lifeng Guo (651) 296-8112.

Sincerely,



Nile Fellows
Project Manager
Superfund Section
Majors and Remediation Division
(651/296-7299)



Darryl Owens
Remedial Project Manager
Remedial Response Branch
U.S. Environmental Protection Agency
(312/886-7089)

NF/DO:jmp

cc: Mr. Bill Gregg, ENSR Consulting and Engineering